IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

SECURITIES AND EXCHANGE COMMISSION,	
	§
Plaintiff,	§
	§
v.	§
	§
META 1 COIN TRUST,	§
ROBERT P. DUNLAP, individually and d/b/a	§ Civil Action No.: 1:20-cv-273-RP
CLEAR INTERNATIONAL TRUST,	§
NICOLE BOWDLER, and DAVID A. SCHMIDT,	§
	§
Defendants,	§
	§
and	§
	§
PRAMANA CAPITAL, INC.,	§
PETER K. SHAMOUN a/k/a PETER K. SHAMOON,	§
WANDA IRONHEART TRAVERSIE-WARNER,	§
ALFRED DEWITT WARNER JR., and	§
IRONHEART TRUST,	§
	§
Relief Defendants.	§
	§

JOINT MOTION OF PLAINTIFF SEC AND SHAMOON RELIEF DEFENDANTS REGARDING COURT'S ORDER DATED JUNE 24, 2020

Plaintiff Securities and Exchange Commission ("SEC") and Relief Defendants Pramana Capital, Inc. and Peter K. Shamoun a/k/a Peter K. Shamoon (together, the "Shamoon Relief Defendants") (collectively, "the Parties") respond as follows to the Court's June 24, 2020 Order [Dkt. 79] that the parties file an agreed proposed scheduling order or motion concerning the same:

I. CURRENT STATUS

1. On March 16, 2020 and May 14, 2020, the SEC filed its Complaint and Amended Complaint, respectively, seeking emergency relief to halt ongoing fraudulent activity. [See Dkt.

- 1-3; 50-54.] Since then, the Court has temporarily and preliminarily restrained the Defendants from engaging in certain illegal conduct, frozen the assets of Defendants and Relief Defendants, and ordered each Defendant and Relief Defendant to account for the use and disposition of investor funds, among other things. In addition, the Court has issued contempt orders as to Defendants Dunlap and Schmidt, and issued warrants for their arrests. [Dkt. 39-41.]
- 2. The Shamoon Relief Defendants have fully complied with all orders to which they are subject and have provided the SEC with all accountings due at this time under the Court's Order. The Shamoon Relief Defendants have also timely responded to the SEC's First Request for the Production of Documents and provided all responsive documents to which they have access as required by the Court's Order.
- 3. The SEC and the Shamoon Relief Defendants are the only parties to the lawsuit who have appeared in this matter—no Defendants or other Relief Defendants have answered or otherwise appeared. As such, it is impossible to file an agreed proposed scheduling order amongst all parties at this time.

II. <u>JOINT MOTION</u>

In light of the foregoing, the Parties move the Court to postpone the filing deadline on a joint proposed scheduling order for 30 days, or until further Court Order.

The Parties seek an extension not for purposes of delay, but in the interest of justice.

CONCLUSION

THEREFORE, the Parties respectfully request that the Court: (1) grant the motion to postpone the filing of a scheduling order by 30 days or until further Court order; and (2) grant such further relief to which the Parties may be entitled.

DATED: July 7, 2020 Respectfully submitted,

/s/ William B. Mateja

William B. Mateja Texas Bar No. 13185350 bmateja@sheppardmullin.com Jason C. Hoggan (*pro hac vice*)

Texas Bar No. 24083188 jhoggan@sheppardmullin.com Sheppard Mullin Richter & Hampton LLP

2200 Ross Avenue, 24th Floor

Dallas, Texas 75201

Telephone: (469) 391-7400 Facsimile: (469) 391-7401

COUNSEL FOR RELIEF DEFENDANTS PRAMANA CAPITAL, INC. AND PETER K. SHAMOON /s/ Jennifer D. Reece

Jennifer D. Reece Texas Bar No. 00796242

James E. Etri

Texas Bar No. 24002061

United States Securities and Exchange

Commission

Burnett Plaza, Suite 1900 801 Cherry Street, Unit 18 Fort Worth, Texas 76102

Direct phone: (817) 978-6442 (JDR)

Fax: (817) 978-4927 reecej@sec.gov

COUNSEL FOR PLAINTIFF SECURITIES AND EXCHANGE COMMISSION

CERTIFICATE OF SERVICE

I certify that on July 7, 2020, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties according to FED. R. CIV. P. 5(b)(2).

/s/William B. Mateja
William B. Mateja